

**IN THE UNITED STATES DISTRICT COURT OF THE VIRGIN ISLANDS  
ST. CROIX DIVISION**

XIAOLIN CHI and FAYUN LUO, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff(s),

vs.

QIAO XING UNIVERSAL RESOURCES, INC.,  
RUI LIN WU, ZHI YANG WU, JIUJIU JIANG, and  
AIJUN JIANG,

Defendants.

CASE No.: 1:12-cv-00045-WAL-GWC

CLASS ACTION

**LEAD PLAINTIFF'S MOTION FOR CLASS CERTIFICATION, APPOINTMENT OF  
CLASS REPRESENTATIVES AND CLASS COUNSEL, AND DEFAULT JUDGMENT**

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*Lead Counsel and [Proposed] Class Counsel*

PLEASE TAKE NOTICE that Lead Plaintiff and Proposed Class Representative Xiaolin Chi (“Chi” or “Lead Plaintiff”), by and through his counsel, The Rosen Law Firm, respectfully move this Court, before the Honorable Wilma A. Lewis, United States District Judge, for an Order:

- (a) pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, for the entry of a default judgment against Defendants Qiao Xing Universal Resources, Inc. (“Xing”), Rui Lin Wu (“R. Wu”), Zhi Yang Wu (Z. Wu”), and Jiujiu Jiang (“Jiang”) for eleven million seventy four thousand, two hundred and one dollars (**\$11,074,201**);
- (b) certifying the following proposed class (the “Judgment Class” or “Class”) for the purpose of entering the Default Judgment against Xing, R. Wu, Z. Wu, and Jiang:

All persons and entities that purchased or otherwise acquired the common stock of Xing during the period from May 26, 2010 to April 16, 2012, both dates inclusive (“Class Period”). Excluded from the Class are Defendants, members of the immediate families of individual Defendants, any entity that directly or indirectly controls or is controlled by, or is under common control with any Defendant, and the present and former officers, directors, employees, affiliates, legal representatives, heirs, processors, successors, and assigns of individual Defendants and/or Xing.

- (c) appointing Lead Plaintiff Chi as Class Representative;
- (d) appointing Lead Counsel The Rosen Law Firm, P.A. as Class Counsel and the Law Offices of Kevin Rames as Liaison Counsel for the Class ; and
- (e) granting such other and further relief as the Court may deem just and proper.

In support of this Motion, Lead Plaintiff submits herewith

- (1) a Memorandum of Law in Support of Lead Plaintiff’s Motion for Class Certification and Default Judgment;
- (2) the Declaration of Kevin Rames and exhibits attached thereto; and

(3) the Report of Dr. Adam Werner and exhibits attached thereto.

Dated: July 8, 2015

Respectfully submitted,

**LAW OFFICES OF K. A. RAMES, P.C.**

/s/ Kevin A. Rames, Esq.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this, the 8<sup>th</sup> day of July, 2015, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Kevin A. Rames, Esq.